

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

BARBARA ANN THURMAN BLEVINS,

Plaintiff,

V.

PROGRESSIVE INSURANCE
COMPANY,

Defendant.

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) CIVIL ACTION NO.: CV06-398-MHT
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MOTION FOR SUMMARY JUDGMENT

Comes now the defendant, Progressive Specialty Insurance Company (“Progressive”), pursuant to Rule 56(c) of the Federal Rules of Civil Procedure, and moves the court to enter a summary judgment in its favor on the grounds that there are no genuine issues as to any material fact and that it is entitled to a summary judgment as a matter of law.

This motion is based upon the pleadings, exhibits, and affidavit of Larry Lackey. Progressive is submitting a statement of undisputed facts and memorandum brief in additional support of this motion.

/s/ R. Larry Bradford
R. Larry Bradford, Attorney for
Defendant, Progressive Specialty
Insurance
Attorney Bar Code: BRA039

OF COUNSEL:

Bradford & Sears, P.C.
2020 Canyon Road, Suite 100
Birmingham, AL 35216
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been served upon the following via electronic filing on this 10th day of October, 2006.

W. Terry Bullard, Esq.
P.O. Box 398
Dothan, Alabama 36302

/s/ R. Larry Bradford
OF COUNSEL